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9	Leticia Rodriguez	
1.0		
10		
11	UNITED STATES DISTRICT COURT	
12	DISTRICT OF NEVADA	
13	DISTRICT	or nevada
		Case No.: 2:21-cv-0
14	LETICIA RODRIGUEZ,	
15		
16	Plaintiff(s),	JOINT MOTION
17		STIPULATION F
17	VS.	OF TIME FOR PI
18		FILE RESPONSE

NATIONAL CONSUMER TELECOM &

Defendant(s).

UTILITIES EXCHANGE; COX

COMMUNICATIONS,

Case No.: 2:21-cv-01407-JCM-BNW

JOINT MOTION AND STIPULATION FOR EXTENSION OF TIME FOR PLAINTIFF TO FILE RESPONSE TO COX **COMMUNICATION'S MOTION** TO DISMISS AND COX **COMMUNICATION TO FILE A REPLY BRIEF** 

(Second Request)

Leticia Rodriguez ("Plaintiff"), by and through her counsel, together with Defendant Cox Communication ("Cox"), by and through its counsel, collectively the "Parties", and hereby jointly move, stipulate and agree to extend the time for Plaintiff to respond to Defendant Cox's Motion to Dismiss Complaint ("Motion to Dismiss"), filed on November 8, 2021 as ECF #21, to December 20, 2021.

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Additionally, the Parties jointly move to extend the date for Defendant Cox to file a Reply Brief, if any, to **December 30, 2021**. In support of this joint motion, the Parties show the Court as follows:

Plaintiff's current deadline to respond to the Motion to Dismiss is December 13, 2021. The reason for the one-week extension is because Plaintiff needs additional time to review and examine recently obtained information concerning the creation and registration of the relevant Cox communication account, which impacts the legal analysis set forth in the Motion to Dismiss and Plaintiff's response thereto. Due to the availability of Cox's counsel and its representatives during the holiday season, additional time will be necessary to prepare a reply brief.

This is the second request for an extension and Defendant Cox has agreed to the extension of time and will not be prejudiced by the extension. Likewise, the extension of time does not affect nor will it prejudice Defendant National Consumer Telecom & Utilities Exchange ("NCTUE").

Stipulated and Agreed: December 13, 2021.

/s/ Shawn W. Miller David H. Krieger, Esq. Shawn W. Miller, Esq. KRIEGER LAW GROUP, LLC 2850 W. Horizon Ridge Pkwy., Suite 200 Henderson, Nevada 89052 Attorneys for Plaintiff

/s/ Michael N. Feder Michael N. Feder, Esq. **DICKINSON WRIGHT PLLC** 3883 Howard Hughes Parkway Suite 800 Las Vegas, Nevada 89169 Attorneys for Defendant COX

## **ORDER GRANTING EXTENSION OF TIME**

IT IS SO ORDERED.

Mus C. Mahan UNITED STATES DISTRICT JUDGE

December 15, 2021

Dated: